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VIA ECF

March 30, 2023

The Honorable John G. Koeltl

U.S. District Judge

U.S. District Court for the Southern District of New York

Daniel Patrick Moynihan U.S. Courthouse

500 Pearl Street, Courtroom 14A

New York, NY 10007

APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

3/30/23

Re: Shirley Burris v. Housing and Services, Inc. et al., Case No. 17 CV 09289 (JGK) (RWL)

Dear Judge Koeltl:

The parties in the above-referenced action write consistent with the Court's order (ECF No. 125) to submit a joint proposed expert discovery schedule.

In light of the settlement conference scheduled for April 20, 2023, at 9:30 a.m. (ECF No. 126) but cognizant of the Court's guidance on timing at the March 23 telephone conference, the parties believe that the schedule proposed below will allow for prompt resolution of expert discovery while accommodating the time necessary to obtain medical records, perform examinations, and prepare expert disclosures.

- 1. Authorization to be provided by April 7, 2023;
- 2. Opening expert report due May 10, 2023;
- 3. Rebuttal expert report due June 9, 2023;
- 4. Expert depositions completed by June 30, 2023.

We thank the Court for its attention this matter.

Respectfully submitted,

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